CAUSE NO. 24-0753-C

LA VENTANA RANCH OWNERS ASSOCIATION, INC.	§	**IN THE COUNTY COURT**
Plaintiff	§	
	§	
v.	§	**AT LAW NO. 1**
	§	
JAKOB SKELTON AND STEPHANIE CHANG A/K/A STEPHANIE SKELTON	§	
Defendants	§	**HAYS COUNTY, TEXAS**

PLAINTIFF/COUNTER-DEFENDANT LA VENTANA RANCH OWNERS ASSOCIATION, INC.'S OBJECTIONS AND RESPONSES TO DEFENDANT STEPHANIE SKELTON'S FIRST SET OF DISCOVERY

TO: Jakob Skelton and Stephanie Chang a/k/a Stephanie Skelton by and through their attorneys of record Melissa Carr, DuBois, Bryant & Campbell, LLP, 303 Colorado Street, Suite 2300, Austin, Texas 78701 and William D. Davis, Davis & Associates, P. O. Box 1093, Dripping Springs, Texas 78620.

In accordance with Texas Rules of Civil Procedure, Plaintiff/Counter-Defendant La Ventana Ranch Owners Association, Inc.'s Objections and Responses to Defendant Stephanie Skelton's First Set of Discovery to La Ventana Ranch Owners Association, Inc.

Respectfully submitted,

CAGLE PUGH

/s/ Adam Pugh

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served in accordance with Rules 12 and 21a of the Texas Rules of Civil Procedure as follows on August 4, 2025:

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/s/ Adam Pugh
Adam Pugh

GENERAL OBJECTIONS

1. Plaintiff objects to *Defendant Stephanie Skelton's First Request for Production to Plaintiff/Counter-Defendant La Ventana Ranch Owners Association, Inc.* to the extent that she seeks to limit the Plaintiff's testimony or the evidence which may be introduced and presented at trial.

2. Plaintiff objects to *Defendant Stephanie Skelton's First Request for Production to Plaintiff/Counter-Defendant La Ventana Ranch Owners Association, Inc* to the extent she seeks information protected under the attorney-client or work product privileges.

3. Plaintiff objects to *Defendant Stephanie Skelton's First Request for Production to Plaintiff/Counter-Defendant La Ventana Ranch Owners Association, Inc* objects to the extent they seek information that is equally accessible to Defendant, or already in its possession or control.

4. The answers below are based on all the information reasonably available to Plaintiff at the time these answers are made.

5. Pursuant to TRCP 193.2 Plaintiff reserves its right to amend or supplement these answers with additional objections that were inapplicable or unknown at the time the answers were made.

6. Plaintiff answers are at all times subject to such additional or different information as discovery or further investigation may disclose, and while based on the present state of Plaintiff's recollection, are subject to refreshing of recollection and additional knowledge of fact as may result from Plaintiff's further discovery and/or investigation. Plaintiff reserves the right to make any use of or to introduce at any hearing or trial information and/or documents responsive to the answers discovered subsequent to the date of this response.

7. Plaintiff's failure to make any objection, either in these general objections or in a specific response below, through inadvertence, through ignorance of facts giving rise to such objection, or for any other reason, should not be considered a waiver of such objection.

8. These General Objections are incorporated into each of the following specific objections below.

SUPPLEMENTS TO RESPONSES

1. Plaintiff reserves the right to supplement all responses in accordance with the Texas Rules of Civil Procedure.

I. REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered imposing a fine against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 2: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted on imposing a fine against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 3: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered initiating an enforcement action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 4: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted on initiating an enforcement action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 5: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered initiating a foreclosure action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 6: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted on initiating a foreclosure action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 7: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered seeking civil penalties against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 8: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted on seeking civil penalties against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 9: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered initiating this legal action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 10: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted on initiating this legal action against Skelton.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 11: Produce each document supporting any claim for actual damages incurred by LVROA that it is attributing to Skelton or conditions on Skelton's Property in this legal action.

OBJECTION: Request lacks specificity. A party may object when a request lacks specificity or is so vague and unclear that the party cannot identify the information requested. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App. – Corpus Christi 1996, orig. proceeding).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 12: Produce each payment plan LVROA has sent to Skelton concerning payment of charges imposed by LVROA with respect to any of the Property or the Defendants.

OBJECTION: Request lacks specificity. A party may object when a request lacks specificity or is so vague and unclear that the party cannot identify the information requested. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App. – Corpus Christi 1996, orig. proceeding).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 13: Produce each communication LVROA has sent to any of the Defendants pertaining to the subject matter of this legal action.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 14: Produce each communication LVROA has received from any of the Defendants pertaining to the subject matter of this legal action.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 15: Produce each communication LVROA has had (received or sent) with non-parties to this legal action (other than attorney-client communications between LVROA and its counsel). This request is not seeking attorney- client privileged communications.

OBJECTION: Request lacks specificity. A party may object when a request lacks specificity or is so vague and unclear that the party cannot identify the information requested. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App. – Corpus Christi 1996, orig. proceeding).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 16: Produce each posting on online forums such as Facebook, TikTok, NextDoor, etc. made by any LVROA board member concerning this legal action.

OBJECTION: Improper Request. Plaintiff will only have documents which are in its possession, control, and custody. Plaintiff cannot produce documents which are not in Plaintiff's possession, custody, and control, a.k.a. documents wherein Plaintiff was not included and/or provided.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 17: Produce each posting on online forums such as Facebook, TikTok, NextDoor, etc. made by any LVROA board member concerning the subject matter of this legal action (including pre-suit postings).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

OBJECTION: Improper Request. Plaintiff will only have documents which are in its possession, control, and custody. Plaintiff cannot produce documents which are not in Plaintiff's possession, custody, and control, a.k.a. documents wherein Plaintiff was not included and/or provided.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 18: Produce each communication including posts on online forums such as Facebook, TikTok, NextDoor, etc. made by any LVROA board member, including communications made on or on behalf of the board, concerning Skelton's nomination, application, candidacy, and election results for her candidacy for a position on the LVROA board.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient. *See* Texas Rule of Civil Procedure 192.4(a).

OBJECTION: Improper Request. Plaintiff will only have documents which are in its possession, control, and custody. Plaintiff cannot produce documents which are not in Plaintiff's possession, custody, and control, a.k.a. documents wherein Plaintiff was not included and/or provided.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 19: Produce the dedicatory instrument purporting to authorize the LVROA to impose a fine against Skelton as set forth in Ex. B to your Original Petition.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 20: Produce each document supporting your allegation of an irreparable injury to the LVROA as set forth in ¶22 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 21: Produce each document supporting your allegation of an "impairment to aesthetic value" as set forth in ¶22 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 22: Produce each document supporting your allegation of "loss of the right to quiet enjoyment of their property" as set forth in ¶22 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 23: Produce each document supporting your allegation of "reduction in monetary value" as set forth in ¶22 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 24: Produce documents identifying any actual damage to LVROA resulting from of the "violation of the Declaration" as set forth in ¶23 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 25: Produce documents identifying any actual damage to any owner of property within the La Ventana subdivision resulting from of the "violation of the Declaration" as set forth in ¶23 of your Original Petition. Such documents may include, for example: invoices, checks, receipts for payment, or similar instruments reflecting charges or payments for repair or remediation or other purported injury LVROA incurred.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 26: Produce documents (photos, images, witness statements) evidencing Skelton's ducks on any lot other than her own Property.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 27: Produce documents (photos, images, witness statements) evidencing Skelton's ducks located outside any enclosure on her Property.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 28: Produce all communications to or from the La Ventana Architectural Committee concerning lots in the La Ventana Subdivision. The relevant time period for this request is January 1, 2021 through the present. This includes improvement requests, variance requests, waiver requests, and any other requests. This includes decisions pertaining to such requests. This includes communications between the Architectural Committee and any board member of the LVROA relating to such requests. This includes any communications in which the Architectural Committee alleges noncompliance.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 29: Produce each document issued by either of the LVROA board or Architectural Committee either approving or denying lot owners within the

La Ventana Subdivision other than Skelton to keep animals on their respective lot(s).

OBJECTION: Request lacks specificity. A party may object when a request lacks specificity or is so vague and unclear that the party cannot identify the information requested. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App. – Corpus Christi 1996, orig. proceeding).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 30: Produce each dedicatory instrument including restrictions, policies, resolutions which sets forth a policy for LVROA enforcement of a dedicatory instrument.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of document**s LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 31: Produce each dedicatory instrument for the La Ventana Subdivision which provides for an owner to maintain animals (by type or number) otherwise prohibited by the Declaration (e.g., a non-enforcement policy).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 32: Produce each document you contend constitutes Skelton's authorization for the LVROA to publicize her healthcare provider's medical diagnosis.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 33: Produce any dedicatory instrument governing LVROA's privacy practices concerning disclosure of a member's healthcare information.

OBJECTION: Request lacks specificity. A party may object when a request lacks specificity or is so vague and unclear that the party cannot identify the information requested. *See Davis v. Pate*, 915 S.W.2d 76, 79 n.2 (Tex. App. – Corpus Christi 1996, orig. proceeding).

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 34: Produce the dedicatory instrument identified in ¶10 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 35: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board considered imposing a fine against Skelton as described in Ex. B of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 36: Produce each i) notice and ii) minutes of a board meeting of the LVROA at which the board voted to impose a fine against Skelton as described in Ex. B of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 37: Produce each request for accommodation submitted by any other La Ventana Subdivision lot owner seeking accommodation for animals.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 38: Produce each notice of violation sent to La Ventana Subdivision lot owners during the period January 1, 2021 to the present in which a violation of a provision of the Declaration is alleged.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 39: Produce the complete engagement agreement between LVROA and the law firms and attorneys engaged since January 1, 2021 including the law firm and attorneys engaged for this legal proceeding.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

WITHHOLDING STATEMENT: Work Product. Information which is responsive to this request may be being withheld as said material constitutes (1) material prepared or mental impressions developed in anticipation of litigation, by or for the Defendants or their representatives including but not limited to Defendants' attorneys, employees and/or agents or (2) communications made in anticipation of litigation between Defendants and their representatives or among the representatives, including the Defendants' attorneys, employees and/or agents. TRCP 192.5(a); *In re Lumbermen's Underwriting Alliance*, 421 S.W.3d 289, 292 (Tex.App.-Texarkana 2014, orig. proceeding); *In re Monsanto Co.*, 998 S.W.2d 917, 924 (Tex.App.-Waco 1999, orig. proceeding).

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 40: Produce the complete engagement agreement between LVROA and the managing agents it has engaged since January 1, 2021 including the present managing agent.

OBJECTION: Relevance: Plaintiff objects to this request as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

OBJECTION: Not within the scope of discovery. Plaintiff's engagement agreements are not relevant to this matter. Further, none of this information is reasonably calculated to lead to the discovery of admissible evidence. Texas Rule of Civil Procedure 192.3(a); *see In re National Lloyds Ins.*, 449 S.W.3d 486, 488 (Tex. 2014); *In re CSX Corp.*, 124 S.W.3d 149, 152 (Tex. 2003).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

REQUEST FOR PRODUCTION NO. 41: Produce the insurance policies, including the declarations page, which the LVROA has coverage for itself, its real and personal property, its directors and officers, and its committee members irrespective of the nature of the risk covered.

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060.**

REQUEST FOR PRODUCTION NO. 42: Produce the document purporting to authorize the managing agent to impose fines on La Ventana Subdivision lot owners as set forth in Ex. B of your Original Petition.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

RESPONSE: Subject to and without waiving any objections, see Plaintiff's production of documents **LAVENTANA 000001 – LAVENTANA 000060**.

II. REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit Skelton's ducks have only been maintained on her own Property.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission because, after making a reasonable inquiry, the information known or easily obtainable is insufficient to enable the Plaintiff to admit or deny. See Tex.R.Civ.P. 198.2(b).

REQUEST FOR ADMISSION NO. 2: Admit Skelton's ducks have only been maintained within an enclosure on her own Property.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission because, after making a reasonable inquiry, the information known or easily obtainable is insufficient to enable the Plaintiff to admit or deny. See Tex.R.Civ.P. 198.2(b).

REQUEST FOR ADMISSION NO. 3: Admit lot owners other than Skelton have maintained ducks within the La Ventana Subdivision.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission because, after making a reasonable inquiry, the information known or easily obtainable is insufficient to enable the Plaintiff to admit or deny. See Tex.R.Civ.P. 198.2(b).

REQUEST FOR ADMISSION NO. 4: Admit representatives of the LVROA instructed to Skelton she could maintain ducks on her lot.

RESPONSE: Admit that in a courtesy notice dated 6/20/24, Goodwin Management mistakenly advised Defendants/Counter-Plaintiffs that they were allowed up to six ducks.

REQUEST FOR ADMISSION NO. 5: Admit the LVROA has taken no action against owners of other lots within the La Ventana Subdivision who maintain ducks on their lots.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Admission on the grounds that it assumes facts not established or known—namely, that other owners actually "maintain ducks on their lots." LVROA has no admissible evidence to confirm whether or not such conduct is taking or has taken place, and the Request improperly assumes such facts.

RESPONSE: Subject to the foregoing objection, and without waiving same, Admit.

REQUEST FOR ADMISSION NO. 6: Admit the LVROA's actions in suing lot owners for alleged deed restriction violations harms the value of those properties.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 7: Admit the LVROA has incurred no actual damage stemming from the breach of restrictive covenant by Skelton alleged by the LVROA in this legal proceeding.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 8: Admit the LVROA's authorization for 6 ducks as set forth in ¶13 of your Original Petition is arbitrary.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 9: Admit the LVROA's authorization for 6 ducks as set forth in Ex. B of your Original Petition is arbitrary as to the number of ducks.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 10: Admit the LVROA targeted Skelton for this legal action due to her status as a military veteran.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 11: Admit the LVROA targeted Skelton for this legal action due to her spouse's status as a military veteran.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 12: Admit the LVROA targeted Skelton for this legal action due to her disability status.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 13: Admit the LVROA targeted Skelton for this legal action due to her spouse's disability status.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 14: Admit the LVROA targeted Skelton for this legal action due to her familial status.

OBJECTION: This Request for Production is vague, ambiguous, and overbroad because it uses the term "familial status" without providing a definition or clarification. This term is not defined in the instructions or the request, and its meaning is unclear, rendering the request unintelligible and incapable of a complete or accurate response.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 15: Admit the LVROA publicized Skelton's medical diagnosis without her authorization.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 16: Admit the LVROA publicized Skelton's medical diagnosis for the purpose of harming her reputation.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 17: Admit the LVROA publicized Skelton's medical diagnosis for the purpose of embarrassing her.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 18: Admit LVROA expressly informed La Ventana Subdivision lot owners that board candidate Skelton had been sued by the LVROA.

RESPONSE: Admit.

REQUEST FOR ADMISSION NO. 19: Admit LVROA expressly informed La Ventana Subdivision lot owners that board candidate Skelton had been sued by the LVROA for the purposes of harming her candidacy.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 20: Admit incumbent candidates for the LVROA board expressly informed La Ventana Subdivision lot owners that board candidate Skelton had been sued by the LVROA.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 21: Admit the LVROA did not disclose to Skelton that it would publish medical records pertaining to her diagnosis and treatment prior to her providing such records to the LVROA.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Admission on the grounds that it assumes facts not established or known—namely, that LVROA published medical records, and the Request improperly assumes such facts.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 22: Admit the LVROA did not disclose to Skelton the identity of any persons her medical records would be made available to prior to her disclosure of her medical records to the LVROA.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Admission on the grounds that it assumes facts not established or known—namely, that LVROA disclosed or published medical records or make them available, and the Request improperly assumes such facts.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 23: Admit the LVROA has no competent person to ascertain whether Skelton's disability is observable.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Production on the grounds that it is vague, ambiguous, and simply makes no sense, rendering the request unintelligible and incapable of a complete or accurate response.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 24: Admit the LVROA has no competent person to ascertain the certain other information to determine if a reasonable accommodation is required to be made for Skelton by law.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Production on the grounds that it is vague, ambiguous, and simply makes no sense, rendering the request unintelligible and incapable of a complete or accurate response.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 25: Admit the LVROA has no competent person to ascertain whether Skelton's ducks provide therapeutic emotional support.

OBJECTION: La Ventana Ranch Owners' Association, Inc. ("LVROA") objects to this Request for Production on the grounds that it is vague, ambiguous, and simply makes no sense, rendering the request unintelligible and incapable of a complete or accurate response.

RESPONSE: Plaintiff can neither admit nor deny this Request for Admission in accordance with the objection above.

REQUEST FOR ADMISSION NO. 26: Admit the LVROA has sought to intentionally exacerbate Skelton's medical condition through at least one of the following acts: threats of fines, publicizing her medical records, filing this lawsuit, disclosing the suit to prejudice her board candidacy, demanding removal of her ducks, or postings by incumbent board members in various forums that Skelton is harming property values.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 27: Admit the LVROA has no dedicatory instrument excluding ducks as household pets.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 28: Admit the LVROA has no dedicatory instrument

setting numeric limits on household pets that may be kept on a lot.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 29: Admit the LVROA has no dedicatory instrument excluding ducks as therapeutic animals.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 30: Admit the LVROA has no dedicatory instrument setting numeric limits on therapeutic animals that may be kept on a lot.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 31: Admit LVROA has an engagement agreement with its managing agent in which the managing agent claims an entitlement to a portion of fines collected.

RESPONSE: Deny.

III. INTERROGATORIES

INTERROGATORY NO. 1: Identify each person assisting in preparing the responses to discovery propounded to you by Skelton.

ANSWER: Mike Evans, Nicole Salakhov, James Painter, Bob Asay, Diana Perry, Gary Wickert, We Ross Wehman, Mona Jones, David Blackwell, Drew Martin, Miha Marquez Vindis, Mayra Marquez Vindis, Adam Pugh, Marla Jones, and Brad Sklencar

INTERROGATORY NO. 2: For each cause of action, defense, and relief sought in your pleadings, please identify whether you are relying upon direct standing or associational standing.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Legal Opinion. Plaintiff further Plaintiff objects to this discovery request to the extent that it calls for a purely legal opinion and/or conclusion from Plaintiff, who is not qualified to render such opinions.

ANSWER: See objections above.

INTERROGATORY NO. 3: Please identify i) each of the LVROA board members that have served on its board at any time from January 1, 2020 to the present, and for each such board member identify ii) the title(s)/officer position(s) held by that board member, and iii) the dates and positions that person served while on the LVROA board during the time period January 1, 2010 to the present.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

ANSWER: See objections above.

INTERROGATORY NO. 4: Please identify i) each person that has served on the LVROA architectural committee members at any time from January 1, 2020 to the present, and for each such person identify ii) the dates that person served on the LVROA Architectural Committee during the time period January 1, 2010 to the present.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

**OBJECTION: Undue burden. This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically, Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

ANSWER: Subject to the foregoing objections, and without waiving same, the following are the current board members: Mike Evans, Nicole Salakhov, James Painter, Bob Asay, Diana Perry, Gary Wickert, We Ross Wehman, Mona Jones, David Blackwell, Drew Martin, Miha Marquez Vindis and Mayra Marquez Vindis

INTERROGATORY NO. 5: Please identify each dedicatory instrument LVROA is relying upon to support its causes of action and relief it seeks in this legal action.

ANSWER: Please refer to Plaintiff's pleadings.

INTERROGATORY NO. 6: Identify each posting on online forums such as Facebook, TikTok, NextDoor, etc. made by any LVROA board member concerning the subject matter of this legal action or this legal action.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically, Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

ANSWER: See objections above.

INTERROGATORY NO. 7: Identify i) each forum LVROA utilizes for communicating with its members (e.g., Facebook, NextDoor, service provided by managing agent, etc.). When identifying the forum, please also indicate ii) whether access (i.e., initiating threads, viewing posts, posting) to the forum is public or limited to invitees. If limited to invitees, please identify iii) the person controlling access to the forum.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

OBJECTION: Undue burden**.** This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically, Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

ANSWER: See objections above.

INTERROGATORY NO. 8: Explain in detail LVROA's process for determining whether to accommodate Skelton including:

i) Who determines whether a disability is observable;
ii) Who and how they determine whether ducks provide therapeutic support for Skelton's disability;
iii) Who and how they determine the number of ducks or limitation on ducks for providing support for Skelton's disability;
iv) Who determines additional information to be requested (as referenced in Ex. C

to Plaintiff's Original Petition;

v) Who LVROA actually engaged to make such determinations from the medical records provided by Skelton; and
vi) The qualifications of any persons engaged by LVROA for the steps i)-v)

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

**OBJECTION: Undue burden. This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically, Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

ANSWER: Subject to the foregoing objections, and without waiving same, plaintiff does not have a formal "process for determining whether to accommodate Skelton" and we are unsure what that even means.

INTERROGATORY NO. 9: Identify any dedicatory instrument, statute, or other document imposing an obligation on the LVROA to enforce the Declaration as you have alleged in ¶21 of your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence

**OBJECTION: Undue burden. This request is unduly burdensome, as this discovery can be obtained from some other source that is more convenient, specifically, Defendant's own records. *See* Texas Rule of Civil Procedure 192.4(a).

ANSWER: Subject to the foregoing objections, and without waiving same, please reference Plaintiff's pleadings regarding the dedicatory instruments which set forth the declarations, reservations, restrictions, covenants, conditions, which the Board is charged with applying to the use, occupancy, and conveyance of all of the lots within La Ventana.

INTERROGATORY NO. 10: Explain the process and the individuals involved in determining Skelton's ducks did not qualify as household pets as alleged in the letter attached as Ex. C to your Original Petition.

OBJECTION: Relevance: Plaintiff objects to this interrogatory as being overbroad, vague, and unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it does not define what is meant by "qualify as household pets."

ANSWER: Please refer to Plaintiff's pleadings.